



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 5, 2010

The Honorable Nancy Sutley  
Chair, The White House Council on Environmental Quality  
Executive Office of the President  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

RE: Comments on Updated Principles and Guidelines for Water and Land Related Resources  
Implementation Studies

Dear Chair Sutley,

We appreciate the opportunity to comment on the Council on Environmental Quality's draft updated "Principles and Guidelines." Over the years, our agency has been involved in many water resource development projects throughout Washington State. We are particularly interested in opportunities to increase beneficial uses of sediment for habitat and beach restoration, including through the development of regional sediment management plans. The 2008 Action Plan for the West Coast Governors' Agreement on Ocean Health also notes the need for the West Coast states to seek changes to federal policy to advance their regional sediment management efforts.

Beneficial use projects often face challenges that the updated Principles and Guidelines will help resolve. In particular, we appreciate the focus of the draft on utilizing principles like ecosystem and watershed processes; on using planning standards like sound science and adaptive management to guide decision-making; and specifically incorporating non-structural alternatives and non-monetary benefits and costs into the planning process. These changes are compatible with our approach to managing these resources and are necessary to modernize the federal approach to water resources management.

In addition, we'd like to suggest a few areas for clarification.

**Further clarify the process for accounting for ecosystem services and non-monetary, costs and benefits.** We greatly appreciate the focus on accounting for non-monetary costs and

benefits, including ecosystem services. Unfortunately, these benefits are often underestimated by current techniques and methods to account for these services are still an emerging practice.

While the concept of capturing these costs and benefits is laudable and necessary, it is difficult to understand how agencies will do this in practice. We suggest that the Council on Environmental Quality provide additional guidance on this process in the principles and guidelines to ensure that agencies adequately account for these costs and benefits.

**Add more specific references to endangered species and water quality for the process of evaluating alternatives.** When evaluating the Natural Resources effects from alternatives, it would be useful to see a discussion of how the preferred alternative increases or decreases the recovery of listed species under the Endangered Species Act or influences water quality standards under the Clean Water Act.

**Provide more specific requirements around transparency of the process and collaborating in studies.** In our experience, federal agencies interpret and implement requirements for transparency or collaborative approaches to studies in various ways. Some approaches are not adequately transparent, which undermines the credibility of the studies. The current draft language suggests several approaches, but leaves too much open to interpretation by agencies. We suggest that the Council on Environmental Quality include stronger requirements for collaborative approaches including: outside peer review throughout study processes, open access to data and methods, and the use of interagency science teams.

To restore and protect ecosystem processes while maintaining vital economic benefits, our nation must change its current approach to water resources development and management. We appreciate the Council on Environmental Quality recognizing and addressing this issue. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Lynn', with a long horizontal flourish extending to the right.

Brian Lynn  
Coastal/Shorelands Section Manager  
Shorelands and Environmental Assistance Program

cc: Mark Rupp